REMARKS

Independent Claims 1, 15, 47, 54, 64, 92, and 115 require a file system structure (and, in some claims, also a pointer) to be stored in a ***write-once*** memory device. These claims were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,832,263 to Hansen et al. under the assertion that Hansen et al. teaches storing file system structures in a write-once memory device. In its prior Amendment, Applicants argued that these claims are patentable over Hansen et al. because what is asserted to be a "file system structure" in Hansen et al. is stored in a ***write-many*** memory device — ***not*** a ***write-once*** memory device, as recited in the claims. In the present Office Action, the Examiner stated that Applicants' argument was not persuasive because col. 4, lines 28-42 and col. 6, lines 42-51 teach keeping a file structure in a non-modifiable store. However, these passages do not teach storing a file structure in a non-modifiable store. Just the opposite, these passages support Applicants' argument.

Col. 4, lines 28-42 states (emphasis added):

> When the agent attempts to store new information or to modify the existing information [in the non-modifiable (i.e., write-once) store (NMS)], a write request is intercepted as indicated by block 30. A new entry is then recorded ***in the tracking store [the write-many memory]*** which includes any information needed to identify the affected area or areas of the NMS as indicated by block 32.

Accordingly, this passage teaches storing an entry in the ***write-many*** memory device (the ***modifiable*** tracking store (TS), such as a floppy diskette) — not in a ***write-once*** memory device. The other cited passage (col. 6, lines 42-51) merely describes a file structure that tracks information stored in the write-many tracking store, and col. 7, lines 1-4 states that such a file structure (e.g., a linked list of file entries) is stored in the ***write-many*** tracking store (TS) — ***not*** in the ***write-once*** memory device.

In summary, because the passages in Hansen et al. that were relied upon to maintain the rejections do not teach the element Applicants argue to be missing in the claims, Applicants respectfully request that rejections of independent Claims 1, 15, 47, 54, 64, 92, and 115 and their dependent claims be removed.[1] If there are any questions concerning this Response, the Examiner is asked to phone the undersigned attorney at (312) 321-4719.

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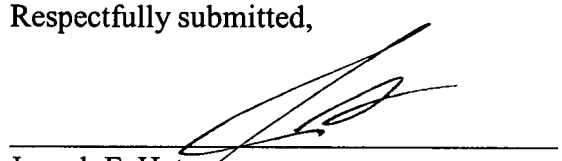
Respectfully submitted,



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[1] The rejections against independent Claims 66 and 74 and their dependent claims should also be removed. These claims recite that the memory device is a handheld memory device that comprises an electrical connector operative to couple with a mating electrical connector of a data storage device. In the Office Action, it was admitted that Hansen et al. does not teach this element. However, it was asserted that one skilled in the art would recognize that memory devices such as CD-ROMs and floppy diskettes are handheld memory devices with electrical connectors. Applicants respectfully disagree as CD-ROMs and floppy diskettes do not have electrical connectors.